

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

JOSEPH R. BIDEN, President of the
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**STIPULATION FOR ORDER
AMENDING BRIEFING SCHEDULE
FOR CROSS-MOTIONS FOR
SUMMARY JUDGMENT AND
RELATED DEADLINES; ORDER
THEREON**

Noted for: February 24, 2021

Pursuant to Local Rule 7(j), the parties respectfully request that the Court extend the existing schedule for dispositive motions and related deadlines by two weeks as indicated below.

Good cause exists to modify the existing schedule. On February 1, 2021, this Court ruled on Plaintiffs' Supplemental Brief (Dkt. 380) after an *in camera* review of selected documents and ordered Defendants to produce lesser redacted versions of numerous documents. *See* Dkt. 451. Plaintiffs require the lesser redacted versions of those documents for purposes of preparing their motion for summary judgment. Due to the practical requirements of processing those documents for production to Plaintiffs, Defendants are unable to produce the documents in sufficient time to meet Plaintiffs' needs. Accordingly, Plaintiffs requested that Defendants stipulate to an extension of the existing briefing schedule and Defendants do not object to the requested extension.

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1 For these reasons, the parties respectfully request that the Court enter an order extending
2 the schedule for dispositive motions and related deadlines by two weeks as follows:

3 The filing deadline for dispositive motions is reset to March 25, 2021, except that
4 Defendants shall be permitted to file a cross-motion for summary judgment on or before May 3,
5 2021. Any other motions, including any *Daubert* motions, due to be filed by the deadline for
6 dispositive motions under the Local Rules shall be filed by the March 25, 2021 deadline and
7 briefed on the schedule set forth in the Local Rules. Further, because the parties previously
8 negotiated and agreed upon the deadlines for exchanging their statistical experts' supplemental
9 declarations based on when the parties' dispositive motion deadlines fell, the parties also request
10 a modest extension for exchanging those supplemental declarations as well.

11 The following schedule will govern briefing of the cross-motions for summary judgment
12 and the supplemental declarations filed by the parties' statistical experts in response to the
13 updated USCIS data:

- 14 - Supplemental declaration of Mr. Kruskol (if any)—March 4, 2021
- 15 - Plaintiff's motion for summary judgment—March 25, 2021
- 16 - Supplemental declaration of Dr. Siskin (if any)—April 19, 2021
- 17 - Defendants' cross-motion and opposition—May 3, 2021
- 18 - Plaintiffs' cross-opposition and reply—June 11, 2021
- 19 - Defendants' cross-reply—July 2, 2021
- 20 - Cross-motions both to be noted for July 2, 2021

SO STIPULATED.

DATED: February 24, 2021

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DATED: February 24, 2021

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ORDER

IT IS SO ORDERED.

DATED: , 2021.

RICHARD A. JONES
United States District Judge